

December 12, 2001

Ms. Colette Davis
Director - ILEC Relations
Covad
1030 Huntwick Court
Roswell, GA 30075

Dear Ms. Davis:

This is in response to your October 31, 2001 memorandum, as well as a follow-up to several conference calls between our companies, regarding issues concerning Covad's ordering of Unbundled Copper Loops – Non-Designed (UCL-ND). Following is BellSouth's response to each issue:

Covad Issue 1: Procedural clarification necessary with the outside technicians regarding turn-up.

BellSouth Response: On UCL-ND orders requiring field dispatch, but no 'loop testing' is specified on the order, the field technician will provision the loop to the point of demarcation (demarc), tag the loop with the Circuit Identification (ID) and CLEC information, and call the CLEC advising that the 'outside portion of the loop' has been provisioned. Due to the fact that the central office (CO) wiring may not yet be complete, the field technicians will advise the CLEC that further testing by the CLEC should not be attempted until the close of business. If the CLEC, during the conversation, requests the location of the demarc, the field technician can provide that information.

No call will be generated to the CLEC by a field technician if a dispatch was not required to provision the loop. Covad may access the CLEC Service Order Tracking System (CSOTS) to view the status of an order after the Firm Order Confirmation (FOC) has been generated up to the completion date of the order. Tagging will occur during a subsequent field dispatch, if and when dispatch is required to resolve a trouble ticket.

On UCL-ND orders with URET1 (loop testing) specified, the field technician will provision the loop to the point of demarc, tag the loop with the Circuit ID and CLEC information, and call the Customer Wholesale Interconnection Network Services (CWINS) Center to coordinate testing with the CLEC. The CLEC notification will occur in conjunction with successfully performing the loop testing.

Covad Issue 2a: Procedural clarification necessary with CO Technician on how to wire, test, trouble shoot this new loop.

BellSouth Response: Covad needs to provide specific examples on the UCL-ND service order numbers regarding the type of problems it has encountered with BellSouth CO personnel so that Root Cause Analyses can be performed by BellSouth to resolve the issue.

Covad Issue 2b: Clarification on pair change issues.

BellSouth Response: BellSouth field technicians can make pair changes during the provisioning of UCL-ND loops if the assigned loop fails to meet the technical specification for this loop type. This also applies when resolving issues with out-of-service UCL-ND loops. If a BellSouth technician must make a change to provide the UCL-ND loop to meet the technical specifications for the loop or to repair the loop, the pair change is made on the BellSouth side of the loop and is transparent to the CLEC because BellSouth is not changing CLEC facilities, only BellSouth facilities.

Covad Issue 3: Alleged confusion in the field.

BellSouth Response: The provisioning process is set forth in the response to 1 above. BellSouth's technicians have been trained regarding provisioning of UCL-ND loops. If you have examples of specific incidences in which a particular technician is failing to follow procedures, we will be glad to investigate.

Covad Issue 4a: The process regarding installation, test, and acceptance of a loop that is QuickServe and being used for the UCL-ND loop type.

BellSouth Response: The process utilized for all UCL-ND loops is described in the response to 1 above. If a CLEC orders an unbundled loop that is ultimately provisioned via a process where no field dispatch is required, tagging will occur during a subsequent field dispatch, if and when dispatch is required to resolve a trouble ticket. If no field dispatch is required, there is no field technician to provide demarc information, tag the loop or notify the CLEC of the disposition of the order. The CLEC may access CSOTS to view the status after the FOC has been generated up to the completion date. The demarc is the point of interface between the BellSouth provided loop and the customer-provided wiring/equipment. If no dispatch is required because of reuse of existing BellSouth facilities, the demarc is already established and available to the CLEC.

Covad Issue 4b: Technical Reference (TR) 73600 language – maintenance of tie cabling.

BellSouth Response: The Certified Vendor who installed the collocation arrangement for the CLEC is responsible for the installation and maintenance of the tie cabling. Covad's Certified Vendor should have a process if the tie cable is the point of failure.

Covad 4c: TR73600 language regarding disconnection of service or equipment connected to an unbundled local loop is causing harm to other services or systems.

BellSouth Response: TR73600 is in the process of being updated, and the following information will appear in Section 3.8:

When an unbundled loop is shown to be causing harm to other systems or services, and when BellSouth has attempted to contact the Competitive Local Exchange Carrier (CLEC) and the CLEC has not responded back in a reasonable length of time, BellSouth reserves the right to disconnect the offending equipment in the BellSouth Central Office and/or the end user's location.

Revision 6 of TR73600 will be posted on the BellSouth Interconnection Services' Web site during the 4th quarter of 2001 at the following Web site address:

<http://www.interconnection.bellsouth.com/guides/html/tech.ref.html>

BellSouth will attempt to contact Covad and resolve any problem shown to be causing harm to other systems or services, but cannot leave the service or equipment in place if to do so would jeopardize the integrity of BellSouth's network.

Covad 4d: Alleged confusion regarding appropriate name of customer.

BellSouth Response: Some of the Covad's Master Q Accounts reflect the following:

Dieca Communications dba Covad.

This is the information that appears on the service order for these accounts. If Covad prefers that the service order read Covad and not DIECA Communications dba Covad, then it may submit a request via the BellSouth Account Team to have all associated Master Q Accounts updated to reflect this change. However, Covad must follow the procedures in place and submit the necessary paperwork to the BellSouth Account team to make these requested changes.

Covad 4e: The 877 number from Covad is missing from the order.

BellSouth Response: A valid toll free contact telephone number, when provided by Covad on its order, is entered in the Remarks Section of the BellSouth service order as part of BellSouth's process. BellSouth's service representatives have been covered again on this issue and reminded to follow this process.

I trust that the above information satisfies your concerns with this matter. Please feel free to contact me with any other questions. I can be reached at 205-321-4981.

Sincerely,

Mailed the Original via US Mail

Scott T. Griffin
BellSouth Interconnection Services
Account Manager